

**Before the
Federal Communications Commission
Washington, DC 20554**

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In the matter of
proposed rulemaking on
broadcast localism

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If the decision is made to require 24/7 staffing at radio stations we will no longer be on the air 24-hours a day. I know of at least two other stations in the area which will also drastically cut back hours of operation. Under FCC rules, no station has an obligation to remain on the air 24 hours daily.

Before FCC regulations allowed "unattended" operation, we shut off our FM station in the early evening and resumed broadcasting at 6:00 AM. If we are forced to go back to that plan it hardly serves the public interest.

It would cost us \$30,000 or more yearly to hire a staff person at minimum wage to fill the period our automation system now handles. We generate perhaps \$2,000 in advertising revenue ANNUALLY through our night time operation, not even enough to pay the additional electric bill. ***Twenty-four-hour operation is a gift to the community, a true public service offering. We do not have to be on the air at night...we choose to be to serve our listeners.***

During emergencies we physically staff the station. Local authorities have our contact numbers and they know we are readily accessible when they need us. All of our programming originates in our city of license. I am the general manager/morning announcer and I live 3 blocks from the station. I can be here in a couple of minutes, I have made the trip many times at 3:00 AM when the weather is threatening. When I'm not available someone else is.

When running in an automated mode our local weather forecasts continue to be updated regularly by a service we use, the EAS system continues to relay alerts as needed, we give the current time and temperature, we air a variety of pre-recorded local public service announcements. ***All of this will stop during the night time if you require us to have a staff person here. It would simply be financially impossible for us to stay on the air that many hours.***

If we do have to cut back due to your decision I will be airing this announcement prior to the evening sign-off:

"Due to new federal regulations designed to improve your local broadcast service, it is no longer financially possible for us to provide 24-hour coverage as we have been doing for many years. KLQP-FM will now leave the air and we will resume broadcasting at 6:00 AM. We apologize for any inconvenience this may cause but it is out of our control."

You will have to tune elsewhere for EAS Alerts which would have been aired here automatically and you will have to tune to a more distant station to receive updates on your local weather. Local public service announcements which you would have heard during the night time hours will now be available only during the day.

Please contact the Federal Communications Commission in Washington, D.C. for a complete explanation on how your local broadcast service has been improved."

Furthermore, you are basing your premise that 24/7 staffing is needed on such incidents as the train derailment in Minot. There were a variety of issues which caused the problems there. It was not a staffing issue. ***It was, in large part, a problem with local law enforcement being unprepared. There was someone at the studio so it was not a staffing problem.***

Now, I will suggest what you can do to keep such problems from happening when the station is running in an automated mode. First, require each radio station to have someone on-call 24 hours a day who can be reached by local law enforcement. In rural Minnesota we maintain excellent emergency ambulance services using the on-call system. There is no one sitting at the ambulance hall 24 hours a day, but we have no trouble securing an ambulance when we need one.

Second, require local law enforcement agencies to install EAS equipment which they can use to access the radio station for emergencies anytime they need to. We had to spend a lot of money to install an EAS encoder/decoder which could easily be accessed by law enforcement in emergencies whether anyone is at the station or not.

Third, if you choose to force us to have someone here 24/7, use your spectrum auction money to pay our additional costs.

I served on your localism panel at Sioux Falls, South Dakota and I listened to a lot of suggestions on ways to improve localism. I advocated a return to more stringent requirements as to operation from the city of license and I suggested better efforts to ascertain community needs. Those are great ideas and you have them in your plan. However, the 24/7 staffing idea is a step back into the stone age and would do severe damage to the service small broadcasters are now able to provide.

Very Truly Yours,



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